



**Montana Department of  
ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor  
Richard H. Opper, Director

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November 17, 2011

**ENVIRONMENTAL  
PROTECTION AGENCY**

NOV 28 2011

~~Ms. Danette Quick  
U.S. Environmental Protection Agency  
Region VIII, Montana Office  
10 West 15<sup>th</sup>, Suite 3200  
Federal Building  
Helena, Montana 59626~~

*Cinna Vallejos*  
*8EPR-PS* **MONTANA OFFICE**

Dear Ms. Quick:

We have enclosed the quarterly report for the Libby NPL Sitewide Cooperative Agreement V-97841901. This report is for the fourth quarter of federal fiscal year 2011. The attached report describes DEQ's activities and financial status under this cooperative agreement during the reporting period.

If you have questions concerning the narrative discussion, please contact Larry Scusa, Federal Superfund Section Supervisor at (406) 841-5035. For financial summary questions, contact Tassie Smith, Accountant at (406) 841-5015.

Sincerely,

Sandra Olsen, Administrator  
Remediation Division

Dean A. Rude, Chief Financial Officer  
Financial Services

Enclosure

cc: Sandi Olsen, RD  
Larry Scusa, RD  
Karen Anthony, FS

Libby Asbestos NPL SITE  
SITE-WIDE COOPERATIVE AGREEMENT (MT-V-97841901)  
FFY 2011 - Fourth Quarter Report  
July 1, 2011 through September 30, 2011

DEQ prepared this quarterly update in accordance with the special conditions of Cooperative Agreement No. MT-V-97841901. The report details activities undertaken and expenses incurred during the reporting period. In November 1999, the EPA Region VIII Superfund Program initiated emergency response actions in Libby, Montana. Response activities focused on rapidly assessing the nature of the problem and taking immediate actions to eliminate high-priority sources of Libby asbestos. EPA listed the site on the NPL in October of 2002.

### Background

The Libby Asbestos Site is centrally located around Sections 3 and 10, T30N, R31W, Lincoln County, Montana. The Libby Asbestos Site is comprised of eight Operable Units. EPA has designated DEQ as the lead agency for OU 7.

- OU 1 – Former Export Plant
- OU 2 – Former Screening Plant
- OU 3 – Mine
- OU 4 – Commercial and residential properties in and around Libby
- OU 5 – Former Stimson Lumber Mill Property
- OU 6 – BNSF Rail Yards and Lines
- OU 7 – Commercial and residential properties in and around Troy
- OU 8 – Highway right-of-way around Libby, Troy, and the surrounding area

### Operable Unit 1 – Former Export Plant

Documents reviewed and/or prepared include:

- Draft Outline for OU1 Site Operations and Maintenance Plan (CDM, January 2011)
- OU1 Draft Final Remedial Action Summary
- Draft Tradesperson and Miscellaneous ABS SAP
- IRIS Toxicological Review of Libby Amphibole Asbestos (External Review Draft)
- Draft Interim Institutional Controls Work Plan
- Record of Decision (EPA, March 2010)
- Numerous resources about asbestos, asbestos identification and analysis, geology of asbestos, and Libby, Montana

Activities include:

- Participated in weekly Construction/Operations and any Libby Team conference calls
- Visited construction site.
- Participated in multiple conference calls and meetings with EPA and the City to discuss remedial design options

- Reviewed correspondence between City and EPA regarding access for remedial action
- Responded to information requests
- Prepared quarterly report for EPA

#### Travel, Meetings, Training and Field Activities:

July 11-15, August 8-12, September 12-16 Libby, participated in monthly meetings with TAG, CAG, O&M, Libby City Council, City/County Board of Health, Lincoln County Commission, Healthy Communities Initiative representatives, and Construction/Operations team calls. Participated in special sessions with Libby City Council regarding remedial actions and access agreement at OU1.

August 22-26, Colorado, attended EPA/DEQ team training  
No travel was charged to OU1 for this reporting period.

#### Operable Unit 2 – Former Screening Plant

Documents reviewed and/or prepared include:

- Draft Tradesperson and Miscellaneous ABS SAP
- IRIS Toxicological Review of Libby Amphibole Asbestos (External Review Draft)
- Draft Interim Institutional Controls Work Plan
- Record of Decision (EPA, March 2010)
- Numerous resources about asbestos, asbestos identification and analysis, geology of asbestos, and Libby, Montana

Activities include:

- Participated in weekly Construction/Operations and Libby Team conference calls
- Responded to information requests
- Prepared quarterly report for EPA

#### Travel, Meetings, Training and Field Activities:

July 11-15, August 8-12, September 12-16 Libby, participated in monthly meetings with TAG, CAG, O&M, Libby City Council, City/County Board of Health, Lincoln County Commission, Healthy Communities Initiative representatives, and Construction/Operations team calls.

August 22-26, Colorado, attended EPA/DEQ team training August 22-26, Colorado, attended EPA/DEQ team training .

No travel was charged to OU2 for this reporting period.

#### Operable Unit 3 – Mine

Documents reviewed and/or prepared include:

- Site Management Plan and Project Schedule (ongoing review and revisions)
- Monthly Progress Reports (Remedium, monthly)
- IRIS Toxicological Review of Libby Amphibole Asbestos (External Review Draft)